

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In the matter of:

United States of America
v.
Stephen A. Wilson
2698 Allegheny Ave.
Columbus, Ohio 43209

:
: **Case No.:**
:
:
: **Magistrate Judge Deavers**
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AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Josh Saltar (Your Affiant), a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, hereby depose and state:

1. I, Special Agent Josh Saltar (your affiant), make this affidavit in support of a criminal complaint to arrest for violations of Title 18 United States §§ 2251 and 2252 – the production and possession of child pornography. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, your affiant did not include each and every fact known concerning this investigation. Your affiant did not withhold any information or evidence that would negate probable cause. Your affiant set forth only the facts that are believed to be necessary to establish probable cause that Stephen A. Wilson (WILSON) committed the violations listed above.

2. I am a Special Agent (SA) with the Federal Bureau of Investigations (FBI) and have been since October 2014. I am currently assigned to the Child Exploitation and Human Trafficking Task Force, Cincinnati Division, Columbus Resident Agency. I am primarily responsible for investigating internet crimes against children, including child pornography offenses and the online exploitation of children.

3. During my career as a SA, I have participated in various investigations involving computer-related offenses and have executed numerous search warrants, including those involving searches and seizures of computers, digital media, software, and electronically stored information. I have worked with multiple international law enforcement agencies around the world, focusing on cyber-terrorism and terrorist financing through computer intrusions. I have also assisted on various cases and violations, ranging from violent crimes against children and white collar to healthcare fraud, counterintelligence, and counterterrorism. As part of my duties as a Special Agent, I investigate criminal violations relating to child exploitation and child pornography violations, including the illegal production, distribution, transmission, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2251, 2252, and 2252A. I have reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media, including computer media.

4. In January of 2020, Bexley Police Department (BPD) was dispatched to Bexley High School to meet with a counselor who had been informed that a child who attended the school had been sexually assaulted by Stephen WILSON. The identified child victim (hereinafter Minor Victim 1) was interviewed in the presence of WILSON and at that time denied any sexual assault had occurred.

5. On July 16, 2020, BPD was contacted by a therapist/social worker who reported that she had been counseling Minor Victim 1 on July 13, 2020, when Minor Victim 1 disclosed that she had been drugged and raped by WILSON [REDACTED]. In addition, the therapist informed BPD that Minor Victim 1 had also disclosed in a counseling session occurring on July 15, 2020, suspected incidents between WILSON and two additional minor females who were known to Minor Victim 1.

6. On July 16, 2020, BPD met with Minor Victim 1 and her therapist at Minor Victim 1's residence. During the conversation with BPD, Minor Victim 1 explained that sometime in approximately January 2020 or possibly earlier, she was at WILSON'S residence when WILSON asked her to watch the sexually themed movie 50 Shades of Grey in his bedroom. While they watched the movie, WILSON gave Minor Victim 1 alcohol and a pill. The next day, WILSON told Minor Victim 1 that the pill was ecstasy, however, Minor Victim 1 stated that at the time she took the pill, she was unaware of what it was. Minor Victim 1 stated that after taking the pill she began to lose consciousness, but before she completely lost consciousness, she remembered that WILSON had removed her pants and underwear. Minor Victim 1 also remembered WILSON beginning to touch around her vagina. When Minor Victim 1 regained consciousness, she was still in WILSON's bedroom and observed her pants were back on.

7. Minor Victim 1 also told BPD that sometime after the incident occurred, Minor Victim 1 told WILSON's wife, Jessica Wilson, about what WILSON had done. Minor Victim 1 then provided BPD with a voice recording that was taken on July 4, 2020. In the recording, Jessica Wilson was apologizing for what WILSON had done to Minor Victim 1 but did not go into any further details about the incident.

8. On July 20, 2020, BPD returned to Minor Victim 1's residence to speak with her again as part of their continuing investigation. During this conversation, Minor Victim 1 revealed that WILSON had video cameras inside his bedroom and around the house that record and save everything. Minor Victim 1 further informed BPD that she knew of two other females, who were now adults, that had also been sexually assaulted by WILSON when they were minors. According to Minor Victim 1, these two females, Victim 2 and Victim 3, could also confirm the information about all the cameras inside WILSON's home and bedrooms.

9. On July 22, 2020, BPD met with Victim 2. Victim 2 stated that when she was 15 or 16 years old, WILSON took her to one of his construction jobs in the city and exposed his penis to her. Victim 2 confirmed the presence of cameras in WILSON's house that were constantly recording, specifically located in WILSON's bedroom, living room, and one camera in the basement facing the laundry room. According to Victim 2, WILSON used his laptop and LG phone to access the videos and recordings from these cameras. In addition, Victim 2

informed BPD that when she was younger, she found text messages and letters between WILSON and Jessica Wilson in which they discussed having sex with younger girls.

10. Later that day, BPD met with Victim 3. Victim 3 informed BPD that when she was 6 years old, WILSON would watch pornography on his laptop and masturbate in front of her and other minor females. Victim 3 further stated that when she was about 7 or 8 years old, she was sleeping by herself when WILSON woke her up by touching her "downstairs area." WILSON told Victim 3 that if she told anyone about the touching, he would hurt her. Victim 3 has observed numerous firearms in WILSON's home and was scared of WILSON. Victim 3 confirmed that WILSON also had numerous cameras in the home that are always recording, and that WILSON watched the recordings on his laptop or cell phone. Furthermore, Victim 3 also informed BPD that she had observed text messages that WILSON and Jessica Wilson had exchanged about sex acts involving young girls.

11. As a result of these revelations, BPD attempted to interview WILSON and obtained search warrants for his residence, his person, and the laptop computer and LG cellular phone that Victims 2 and 3 had described. On July 29, 2020, WILSON finally agreed to speak with BPD at the police station. While WILSON was at the police station, BPD officers simultaneously executed the search warrant at his residence and seized numerous devices and electronics. During his interview at BPD, WILSON discovered that BPD officers were at his residence when surveillance video from his home cameras alerted him on his personal cell phone. BPD then executed the search warrant for WILSON's person and recovered one LG Style 4 Black Phone. WILSON denied anything sexual occurring with Minor Victim 1 or Victims 2 and 3.

12. BPD subsequently submitted WILSON's LG cellular phone to the Bureau of Criminal Investigation (BCI) for a forensic extraction to be completed. The results of that extraction were not received until numerous months later, in January of 2021. Preliminary examination of BCI's extraction from WILSON's phone revealed the presence of approximately 600-700 images and videos that depicted minors, including toddlers, being subjected to various forms of sexual abuse. Additionally, BPD identified still images from a home video recording dated November 16, 2019, that depicted WILSON having sex with a young female, who was subsequently identified as Minor Victim 1. Minor Victim 1 was born in 2003 and was 16 years of age in November of 2019.

13. In January of 2021, an arrest warrant was issued out of Franklin County Municipal Court for WILSON for violations of 2907.02A1A (Rape) and 2907.322 A5 (Pandering Sexually Oriented Material Involving a Minor). Later that day, WILSON was arrested and recovered off his person was a black iPhone 7. WILSON subsequently posted bond and was released from jail pending his trial on the Franklin County charges, with certain pre-trial conditions. Those pre-trial conditions included having no contact with Minor Victim 1.

14. In February 2021, after WILSON had been released, BPD contacted your affiant for assistance with further forensic examinations and potential federal investigation and charges. Your affiant reviewed the case file provided by BPD and obtained a federal search warrant for all

of the devices that had been seized from WILSON's residence and/or person pursuant to the search warrants obtained by BPD.

15. You affiant contacted Minor Victim 1 and interviewed her on March 10, 2021. During that interview, Minor Victim 1 confirmed that WILSON had sexually assaulted her. She also revealed that the morning after the sexual assault had occurred, WILSON had sent her text messages that contained images of his nude genitalia. In the messages to Minor Victim 1 associated with those photos, WILSON stated something to the effect of "look how hard you make me thinking about what happened last night." Minor Victim 1 indicated she immediately informed Jessica Wilson of the sexual assault and showed Jessica Wilson the photos and texts, but Jessica Wilson deleted the messages indicating to Minor Victim 1 that she would handle it.

16. Your affiant further learned from the interview of Minor Victim 1 that in addition to the pill that WILSON had given her on the night of the sexual assault, she had regularly consumed other kinds of illegal drugs. Minor Victim 1 indicated her drug use increased after the sexual assault by WILSON and continued until approximately October of 2020, when she became sober.

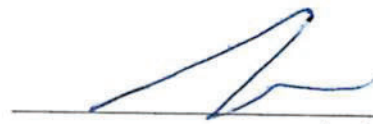
17. In March 2020, pursuant to the federal search warrant, your affiant initiated forensic examinations of WILSON's LG cellular phone. During the forensic examination of that device, your affiant recovered an approximately 22-minute video depicting the sexual assault of Minor Victim 1 by WILSON (Video One). Video One depicts WILSON having oral and vaginal sex with Minor Victim 1. The time stamp on Video One indicates it was created on November 16, 2019. Minor Victim 1 appears to be semi-conscious to unconscious during the sexual assault.

18. In addition to Video One, you affiant recovered an approximately one-minute video that had a time stamp indicating it was recorded on June 26, 2016, depicting an adult male penis touching and rubbing a female pre-pubescent vagina (Video Two). In the last few seconds of the video, the hardwood floors of the location where the video was filmed are shown, but there are no other portions of the video that depict any identifying information of either the adult male, the pre-pubescent female, or the location of the sexual activity. However, your affiant further recovered a text message conversation between WILSON and Jessica Wilson occurring on April 16, 2020. In that conversation, WILSON asked Jessica if she recalled when WILSON "rubbed his cock" on an identified minor female known to both Jessica and WILSON (hereinafter Minor Victim 4). WILSON then proceeded to send Jessica three images depicting an adult male penis touching the vagina of a pre-pubescent female. Your affiant observed these images to be screen shots of Video Two. Furthermore, your affiant reviewed the search warrant photos that were taken by BPD on July 29, 2020, and observed that the living room floor appears to match the hardwood floors as seen in Video Two. At the time Video Two of the June 26, 2016 time stamp on Video Two, Minor Victim 4 would have been approximately seven years of age.

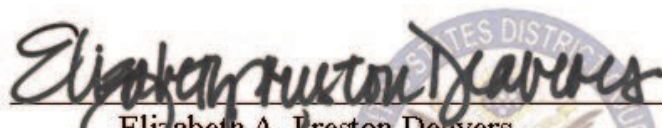
19. The forensic examination of WILSON's cell phone that your affiant has completed thus far has also revealed the presence of the following child exploitation material:

- a. Approximately 350 screen shot images of both Video One and Video Two;
- b. Several hundred images which depicted prepubescent females, some as young as toddler age, engaged in nudity, oral sex, masturbation, or other sexual activity with other adults.
- c. Approximately 25 photos in which WILSON photoshopped his genitalia onto images of minor children, including prepubescent and toddler aged females, to give the affect of those minor children engaging in sexual activity with WILSON.

20. Based upon the above information, your affiant believes there is probable cause to believe Stephen A. WILSON has committed violations of Title 18 United States §§ 2251 and 2252, the production, and/or possession of child pornography. Therefore, your affiant respectfully requests this court issue a criminal complaint and arrest warrant.


Josh Saltar
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before me this 11th day of March, 2021.


Elizabeth A. Preston Deavers
United States Magistrate Judge

